

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNIVERSITY OF NORTHERN
VIRGINIA, INC.,

Plaintiff,

vs.

TIFFIN UNIVERSITY, INC.,

Defendant.

CASE NO. 3:09-CV-2225

JUDGE DAVID A. KATZ

NOTICE OF DEPOSITION DUCES
TECUM OF DAVID LEE

Please take notice that pursuant to Rule 30(b) of the Federal Rules of Civil Procedure, Defendant, Tiffin University, Inc., by and through counsel, gives notice of its intention to take the deposition of David Lee on February 24, 2011, beginning at 1:00 p.m. and continuing day-to-day until completed.

The Deponent is directed to bring with him the following:

1. Copies of any all contracts, applications or documentation concerning enrollment and transfer between Plaintiff and Students alleged to have been intentionally induced by Tiffin University to transfer enrollment from UNVA in Prague to Tiffin University.
2. Copies of the employment and/or personnel file of the employees that Tiffin University allegedly caused or attempted to cause to leave UNVA in Prague to work for Tiffin University.
3. Plaintiff's profit and loss statements or financial statements for each quarter from 2008 through the present date.
4. Any and all documents of whatever kind or nature that analyzes, explains, pertains, or relates to Plaintiff and/or UNVA Prague's loss of ACICS accreditation.

5. Any and all documents of whatever kind or nature that analyzes, explains, pertains, or relates to Plaintiff and/or UNVA Prague's loss of any other accreditation for the provision of educational courses or operation of an educational institution internationally or in the Czech Republic.
6. Copies of any and all agreements or contracts between Plaintiff and UNVA in Prague.
7. The complete personnel files for:
 - a) Yourself;
 - b) Joel Scott;
 - c) Martin McGoldrick;
 - d) Katerina Young;
 - e) Mitchell Young; and
 - f) Daniel Ho.

Said deposition will take place at the law offices of Roetzel & Andress, One SeaGate, Suite 1700, Toledo, Ohio. The deposition will be taken before a duly authorized court reporter of SeaGate Reporting Service, Inc.

Respectfully submitted,

/s/ Denise M. Hasbrook

Denise M. Hasbrook (0004798)
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Counsel for Defendant, Tiffin University

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing Notice of Deposition *Duces Tecum* of David Lee has been served upon the following parties via the Court's electronic filing system , this 10th ay of November, 2010:

Richard M. Kerger, Esq.
Kimberly A. Conklin, Esq.
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*Counsel for Plaintiff,
University of Northern Virginia, Inc.*

Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's System.

Respectfully submitted,

/s/ Denise M. Hasbrook

Denise M. Hasbrook (0004798)
Emily Ciecka Wilcheck (0077895)

Counsel for Defendant, Tiffin University